

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**MARK MONDRAGON o/b/o
D.M. a minor child,**

Plaintiffs,

v.

Case No. 1:21-CV-00427 MV/KRS

**RIO RANCHO PUBLIC SCHOOLS,
BOARD OF EDUCATION and
GEORGE ARCHULETA in his
Individual and official capacity,**

Defendants.

**ANSWER TO DEFENDANT RIO RANCHO PUBLIC SCHOOLS, BOARD OF
EDUCATION'S
FIRST SET OF INTERROGATORIES, REQUESTS FOR PRODUCTION OF
DOCUMENTS, AND REQUESTS FOR ADMISSIONS**

Plaintiff, by and through undersigned counsel, hereby responds to Defendant Rio Rancho Public School's First Set of Interrogatories, Requests for Production and Requests for Admission.

PRELIMINARY STATEMENT

The information contained in the responses set forth below is based upon the information and documents currently available to Plaintiff. Defendant's investigation and discovery in preparation for trial has not been completed. Additional investigation may disclose further information and documents relevant to these responses, as could information and documents obtained by Plaintiff from Defendant or third parties through additional discovery procedures.

EXHIBIT L

INTERROGATORY NO. 2: Please set forth all facts or information to support the allegation that you were groped and/or improperly searched by George Archuleta including when each event occurred, where in V. Sue Cleveland High School or school grounds that each event took place, and who witnessed each event.

ANSWER:

Latter part of 9th grade, George Archuleta escorted D.M. to a private office on the second floor in the sophomore office, under the guise of a search. George Archuleta touched and felt on D.M. penis and buttock. No administrator was present in violation of school policy but after the illegal search security guard Ron walked into the room after the illegal touching by George Archuleta seeing D.M. and George Archuleta alone in the second-floor room alone. In the later part of D.M. sophomore year George Archuleta told D.M. to come and see him in the main office the next morning. When D.M. arrived at school the next morning George Archuleta intercepted D.M. and took him to the office. Once there George Archuleta searched D.M. without cause pulling out D.M. wallet from his pants. Finding a condom in D.M. wallet George Archuleta stated to D.M. showing D.M. the condom “oh you’re a little guy” referring to the size of D.M.’s penis.

Two additional occasions of illegal searches occurred when D.M. was a sophomore. One occurrence was early in Daniels’s sophomore year when George Archuleta took D.M. into the big conference room in the main office, again alone with no administrators present. During this search he touched D.M. genitals outside of the pants and then again by placing his hands inside of D.M. pockets and touching D.M. genitals again. an additional search was done in the later part of D.M. sophomore year in the same fashion in the big conference room

of the main office: with George Archuleta and D.M. and with Mr. Millan Baca present. D.M. stated in front of administrator Baca to not allow George Archuleta to again touch his penis during the search, Administrator Baca told D.M. to shut up and be quiet.

On one occasion D.M. was in a bathroom in his freshman year. George Archuleta searched D.M. by placing his hands in his pocket. He took his hands outside of his pocket without locating any items. He put his hand on the tip of D.M.'s penis and made a circular rubbing motion over the tip of his penis while saying, "what's this?".

INTERROGATORY NO. 3: For any witness identified pursuant to Interrogatory No. 2, please provide their name(s) and contact information.

ANSWER:

Security Guard: Ron –Plaintiff does not know this person's last name or contact information. Plaintiff believes Defendants have the names and contact information of all security guards who work or who have worked for RRPS.

Joseph Salazar – in care of Plaintiff's counsel.

Millan Baca – in care of defense counsel

George Archuleta – in care of defense counsel.